

JS 44 (Rev. 12/07, NJ 5/08)

TON

CIVIL COVER SHEET

14

3785

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

I. (a) PLAINTIFFS

SABRINA NELSON

(b) County of Residence of First Listed Plaintiff Philadelphia

(c) Attorney's (Firm Name, Address, Telephone Number and Email Address)

Craig Thor Kimmel, Esquire
Kimmel & Silverman, P.C.
30 E. Butler Pike
Ambler, PA 19002
(215) 540-8888

DEFENDANTS

PATENAUE & FELIX, A.P.C.

County of Residence of First Listed Defendant

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION

(Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT

(Place an "X" in One Box Only)

| CONTRACT | TORTS | FORFEITURE/PENALTY | BANKRUPTCY | OTHER STATUTES |
|--|--|--|---|---|
| <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise | PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury PERSONAL INJURY <input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability | <input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus - Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions | <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609 | <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input checked="" type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes |
| REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property | CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights | PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus: <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition | | |

V. ORIGIN

(Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from another district (specify)
- ☐ 6 Multidistrict Litigation
- ☐ 7 Appeal to District Judge from Magistrate Judgment

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

15 U.S.C. § 1692

Brief description of cause:
Fair Debt Collection Practices Act

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No

VIII. RELATED CASE(S)

(See instructions):

JUDGE

DOCKET NUMBER

Explanation:

06/18/2014

/s Craig Thor Kimmel CTK 3654

DATE

SIGNATURE OF ATTORNEY OF RECORD

JUN 19 2014

AAS

TON

UNITED STATES DISTRICT COURT

14-cv-3785

FOR THE EASTERN DISTRICT OF PENNSYLVANIA — DESIGNATION FORM to be used by counsel to indicate the category of the case for the purpose of assignment to appropriate calendar.

Address of Plaintiff: 7010 Grays Avenue, Philadelphia, PA 19142

14 3785

Address of Defendant: 213 East Main Street, Carnegie, PA 15106

Place of Accident, Incident or Transaction:

(Use Reverse Side For Additional Space)

Does this civil action involve a nongovernmental corporate party with any parent corporation and any publicly held corporation owning 10% or more of its stock?

(Attach two copies of the Disclosure Statement Form in accordance with Fed.R.Civ.P. 7.1(a))

Yes ☐ No ☒

Does this case involve multidistrict litigation possibilities?

Yes ☐ No ☒

RELATED CASE, IF ANY:

Case Number: Judge

Date Terminated:

Civil cases are deemed related when yes is answered to any of the following questions:

1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court?
Yes ☐ No ☒
2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court?
Yes ☐ No ☒
3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action in this court?
Yes ☐ No ☒
4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual?
Yes ☐ No ☒

CIVIL: (Place ☒ in ONE CATEGORY ONLY)

A. Federal Question Cases:

1. ☐ Indemnity Contract, Marine Contract, and All Other Contracts
2. ☐ FELA
3. ☐ Jones Act-Personal Injury
4. ☐ Antitrust
5. ☐ Patent
6. ☐ Labor-Management Relations
7. ☐ Civil Rights
8. ☐ Habeas Corpus
9. ☐ Securities Act(s) Cases

10. ☐ Social Security Review Cases11. ☒ All other Federal Question Cases

(Please specify) 15 U.S.C. § 1692

B. Diversity Jurisdiction Cases:

1. ☐ Insurance Contract and Other Contracts
2. ☐ Airplane Personal Injury
3. ☐ Assault, Defamation
4. ☐ Marine Personal Injury
5. ☐ Motor Vehicle Personal Injury
6. ☐ Other Personal Injury (Please specify)
7. ☐ Products Liability
8. ☐ Products Liability — Asbestos
9. ☐ All other Diversity Cases

(Please specify)

ARBITRATION CERTIFICATION

(Check Appropriate Category)

I, Craig Thor Kimmel, counsel of record do hereby certify:

- ☐ Pursuant to Local Civil Rule 53.2, Section 3(c)(2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs;
- ☐ Relief other than monetary damages is sought.

DATE: 06/18/2014

Craig Thor Kimmel

Attorney-at-Law

57100

Attorney I.D.#

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

I certify that, to my knowledge, the within case is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: 06/18/2014

Craig Thor Kimmel

Attorney-at-Law

57100

Attorney I.D.#

JUN 19 2014

TON**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA****CASE MANAGEMENT TRACK DESIGNATION FORM**

SABRINA NELSON

v.

PATENAUDE & FELIX, A.P.C.

CIVIL ACTION

14 3785

NO.

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a Case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a Case Management Track Designation Form specifying the track to which that defendant believes the case should be assigned.

SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:

- (a) Habeas Corpus – Cases brought under 28 U.S.C. § 2241 through § 2255. ()
- (b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits. ()
- (c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 53.2. (x)
- (d) Asbestos – Cases involving claims for personal injury or property damage from exposure to asbestos. ()
- (e) Special Management – Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.) ()
- (f) Standard Management – Cases that do not fall into any one of the other tracks. ()

06/18/2014**Date**Craig Thor Kimmel**Attorney-at-law**SABRINA NELSON**Attorney for**215-540-8888**Telephone**877-788-2864**FAX Number**kimmel@creditlaw.com**E-Mail Address**

JUN 19 2014

TON

UNITED STATES DISTRICT COURT
FOR THE
EASTERN DISTRICT OF PENNSYLVANIA

SABRINA NELSON,

Plaintiff

v.

PATENAUDE & FELIX, A.P.C.,

Defendant

14 3785

Case No.:

COMPLAINT AND DEMAND FOR
JURY TRIAL

(Unlawful Debt Collection Practices)

FILED

JUN 19 2014

MICHAEL E. KUNZ, Clerk
By Dep. Clerk

COMPLAINT

SABRINA NELSON ("Plaintiff"), by her attorneys, KIMMEL & SILVERMAN, P.C.,
alleges the following against PATENAUDE & FELIX, A.P.C. ("Defendant"):

INTRODUCTION

1. Plaintiff's Complaint is based on the Fair Debt Collection Practices Act, 15
U.S.C. § 1692 *et seq.* ("FDCPA").

JURISDICTION AND VENUE

2. Jurisdiction of this court arises pursuant to 15 U.S.C. § 1692k(d), which states
that such actions may be brought and heard before "any appropriate United States district court
without regard to the amount in controversy," and 28 U.S.C. § 1331 grants this court original
jurisdiction of all civil actions arising under the laws of the United States.

3. Defendant conducts business in the Commonwealth of Pennsylvania and
therefore, personal jurisdiction is established.

1 4. Venue is proper pursuant to 28 U.S.C. § 1391(b)(2).

2 **PARTIES**

3 5. Plaintiff is a natural person residing in Philadelphia, Pennsylvania 19142.

4 6. Plaintiff is a “consumer” as that term is defined by 15 U.S.C. § 1692a(3).

5 7. Defendant is a national debt collection company with its main office located at
6 4545 Murphy Canyon Road, 3rd Floor, San Diego, California 92123, and having an office
7 located at 213 East Main Street, Carnegie, Pennsylvania 15106.

8 8. Defendant is a “debt collector” as that term is defined by 15 U.S.C. § 1692a(6),
9 and repeatedly contacted Plaintiff in an attempt to collect a debt.

10 9. Defendant acted through its agents, employees, officers, members, directors,
11 heirs, successors, assigns, principals, trustees, sureties, subrogees, representatives, and insurers.

12 **FACTUAL ALLEGATIONS**

13 10. At all relevant times, Defendant was attempting to collect an alleged consumer
14 debt from Plaintiff.

15 11. The alleged debt, a GE Capital Retail Bank personal credit card account, arose
16 out of transactions, which were primarily for personal, family, or household purposes.

17 12. Beginning in or around June 2013, and continuing through September 2013,
18 Defendant repeatedly and continuously contacted Plaintiff on her home and cellular telephones
19 in its attempts to collect a debt.

20 13. Defendant contacted Plaintiff, on average, at least once a day and at times calling
21 more than twice a day in its attempts to collect a debt.

22 14. During the relevant period, Plaintiff received more than ten (10) collection calls a
23 week from Defendant.
24
25

1 15. In those instances where Plaintiff answered Defendant's calls, Defendant
2 demanded payment of more than \$4,400.00.

3 16. Plaintiff informed Defendant that she was unemployed, could not make payment,
4 and to stop calling.

5 17. In response, Defendant's collector stated that he did not care if she doesn't work
6 and claimed she could pay.

7 18. Further, Defendant's collector threatened legal action and told Plaintiff that she
8 doesn't have the money for a lawyer, so it's better if she pays.

9 19. Upon information and belief, at the time Defendant threatened legal action, it did
10 not intend to take the action it threatened, and to date, Defendant has not taken any legal action
11 against Plaintiff.
12

13 20. In addition, Defendant failed to update its records to stop the calls to Plaintiff.

14 21. Rather, Defendant continued calling Plaintiff in its attempts to collect the alleged
15 debt.

16 22. Upon information and belief, when calling Plaintiff, Defendant did not possess
17 information or have a reasonable belief that Plaintiff's financial situation and employment status
18 had changed which would allow her to make payment.

19 23. Defendant's purpose in calling Plaintiff was to annoy, abuse and harass her,
20 believing that it would likely cause Plaintiff to make payment on the alleged debt.
21

22 24. Lastly, in its attempts to collect a debt, on June 25, 2013, Defendant sent Plaintiff
23 written correspondence stating that a debt had been "assigned to this firm to initiate collection
24 efforts regarding [her] delinquent outstanding balance to [its] client." See Exhibit A,
25 Defendant's June 25, 2013, letter.

1 25. The letter is purportedly from Gregg L. Morris, Esquire at Defendant. See
2 Exhibit A.

3 26. The letter was purportedly signed by Gregg L. Morris, Esquire (hereinafter
4 “Attorney Morris”). See Exhibit A.

5 27. Upon information and belief, that is not the “signature” of Attorney Morris on the
6 June 25, 2013, letter to Plaintiff; rather, it is an autopen or computer printing of his name.

7 28. The collection letter was not prepared, reviewed, or sent by Attorney Morris as
8 the letter indicates.

9 29. Upon information and belief, the collection notice was prepared and sent by other
10 individuals employed by Defendant.

11 30. The letter deceptively conveys review and involvement by Attorney Morris,
12 when he had none.

13 31. Upon information and belief, Attorney Morris was not involved in the collection
14 of Plaintiff’s debt.

15 32. Further, Defendant’s letter falsely, deceptively and/or misleadingly represents
16 that Attorney Morris had authored the letter, when he did not.

17 33. Defendant has been sued prior to the instant case for the identical violation in the
18 case of Kathleen Taylor v. Patenaude & Felix, A.P.C., et al., No. 2:13-cv-01281 (E.D. Pa.
19 March 11, 2013).

DEFENDANT VIOLATED THE FAIR DEBT COLLECTION PRACTICES ACT

34. In its actions to collect a disputed debt, Defendant violated the FDCPA in the following ways:

COUNT I

- a. A debt collector violates § 1692d of the FDCPA by engaging in conduct the natural consequence of which is to harass, oppress, or abuse any person in connection with the collection of a debt.
- b. A debt collector violates § 1692d(5) of the FDCPA by causing a telephone to ring or engaging any person in telephone conversation repeatedly or continuously with intent to annoy, abuse, or harass any person at the called number.
- c. Here, Defendant violated §§ 1692d and 1692d(5) of the FDCPA when it repeatedly called Plaintiff on her home and cellular telephones, at least, once a day and sometimes calling more than twice a day, as well as continuing to call Plaintiff after having been told to stop calling and that she did not have the means to pay the debt.

COUNT II

- a. A debt collector violates § 1692e of the FDCPA by using any false, deceptive, or misleading representation or means in connection with the collection of any debt.
- b. A debt collector violates § 1692e(3) of the FDCPA by falsely representing or implicating that any individual is an attorney or that any communication is from an attorney.

- 1 c. A debt collector violates § 1692e(5) of the FDCPA by threatening to take
2 any action that cannot legally be taken or that is not intended to be taken.
- 3 d. Section 1692e(9) of the FDCPA prohibits debt collectors from using or
4 distributing any written communication which simulates or is falsely
5 represented to by a document authorized, issued, or approved by any
6 court, official, or agency of the United States or any State, or which
7 creates a false impression as to its source, authorization, or approval.
- 8 e. A debt collector violates § 1692e(10) of the FDCPA by using any false
9 representation or deceptive means to collect or attempt to collect any debt
10 or to obtain information concerning a consumer.
- 11 f. Here, Defendant violated §§ 1692e, 1692e(3), 1692e(5), 1692e(9) and
12 1692e(10) of the FDCPA sending correspondence which created the false
13 impression that the correspondence was written by an attorney and that the
14 communication was from an attorney, when it was not; by stating Gregg
15 Morris, Esquire had written the letter, when he did not; and threatening
16 suit against Plaintiff when it did not intend to take the action threatened.

17
18 **COUNT III**

- 19 a. A debt collector violates § 1692f of the FDCPA by using unfair or
20 unconscionable means to collect or attempt to collect any debt.
- 21 b. Here, Defendant violated § 1692f of the FDCPA by failing to update its
22 records and continuing to call Plaintiff's home and cellular telephones
23 after being told that she lost her job, she does not have any money, and to
24 stop calling.
25

1 WHEREFORE, Plaintiff, SABRINA NELSON, respectfully pray for a judgment as
2 follows:

- 3 a. All actual damages suffered pursuant to 15 U.S.C. § 1692k(a)(1);
4 b. Statutory damages of \$1,000.00 for the violation of the FDCPA pursuant
5 to 15 U.S.C. § 1692k(a)(2)(A);
6 c. All reasonable attorneys' fees, witness fees, court costs and other litigation
7 costs incurred by Plaintiff pursuant to 15 U.S.C. § 1693k(a)(3); and
8 d. Any other relief deemed appropriate by this Honorable Court.
9

10
11
12 **DEMAND FOR JURY TRIAL**

13 PLEASE TAKE NOTICE that Plaintiff, SABRINA NELSON, demands a jury trial in
14 this case.

15 RESPECTFULLY SUBMITTED,

16 Date: June 18, 2014

17 By: /s Craig Thor Kimmel CTK 3654
18 CRAIG THOR KIMMEL
19 PA ID No. 57100
20 Kimmel & Silverman, P.C.
21 30 E. Butler Pike
22 Ambler, PA 19002
23 Phone: (215) 540-8888
24 Fax: (877) 788-2864
25 Email: kimmel@creditlaw.com

LAW OFFICES OF
PATENAUE & FELIX, A.P.C.
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213 EAST MAIN STREET
CARNEGIE, PENNSYLVANIA 15106
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1771 EAST FLAMINGO RD., STE. 112A
LAS VEGAS, NEVADA 89119
TEL (702) 952-2082 (800) 567-3092
FAX (702) 952-0286

822 SW 6th AVENUE, STE. 1300
PORTLAND OREGON 97204
TEL (503) 210-2674 (800) 832-7675

2200 6th AVENUE, STE. 700
SEATTLE, WASHINGTON 98121
TEL (206) 441-4066 (800) 832-7675
FAX (206) 441-5475

June 25, 2013

SABRINA NELSON
[REDACTED]

RE: Our Client: GE CAPITAL RETAIL BANK (7501-7)
Issued as: Climate Select
Account Number: XXXXXXXXXXXXXXX3964
Our File Number: 13-20125
Balance Due: \$4,402.53

Dear Sabrina Nelson:

Please be advised that the above-referenced debt has been assigned to this firm to initiate collection efforts regarding your delinquent outstanding balance to our client. If you wish to eliminate further collection action, please contact us at (866) 772-7675.

Unless you notify this office within THIRTY (30) days of receiving this notice that you dispute the validity of this debt, or any portion thereof, this office will assume this debt is valid.

If you notify this office in writing within THIRTY (30) days of receiving this notice that this debt, or any portion thereof, is disputed, this office will obtain verification of the debt, or a copy of a judgment against you, and mail you a copy of such verification or judgment. Further, if you make a written request upon this office within THIRTY (30) days of receiving this notice, this office will provide you with the name and address of the original creditor, if different from the current creditor.

This is an attempt to collect a debt and any information obtained will be used for that purpose.

Very truly yours,

LAW OFFICE OF PATENAUE & FELIX

Gregg L. Morris
GREGG L. MORRIS, ESQ.

THIS COMMUNICATION IS FROM A DEBT COLLECTOR

PF_03 Ltr Initial Demand

P&F File No. 13-20125

